

EXHIBIT I

Griffith, Daniel A.

From: Griffith, Daniel A.
Sent: Wednesday, June 25, 2008 10:12 AM
To: 'BLemon@cblh.com'; 'Scott Swenson'
Subject: Curry v. Hopkins

Brian and Scott:

I have reviewed the records pertaining to Mr. Curry's treatment at Tidewater Physical Therapy and intend to participate in Mr. Nichols' deposition by phone this afternoon. Toward that end, Scott, could you please give me a call and set me up on speakerphone when you intend to commence Mr. Nichols' deposition?

Also, by separate e-mails over the next few minutes, I'll be providing you with the following:

1. The Dover Police Department's policies and procedures re: Use of Force;
2. The Dover Police Department's policies and procedures re: use of canines;
3. The Dover Police Department's Internal Affairs file re: the property damage incurred by Officer Hopkins' vehicle on January 13, 2004 as a consequence of the pursuit of Mr. Curry.
4. The HIPAA Authorization executed by Officer Hopkins for the release of his medical records.

Given my representation yesterday about Officer Hopkins' availability for deposition on July 8th and the availability of Officers Taylor and Gott for July 10, I believe the only open matters relate to Officer Hopkins' personnel file. I have mentioned to you my belief that the file would only be relevant and discoverable in claims against the Department as opposed to Officer Hopkins personally. Perhaps you can explain the basis of your request for his personnel file (i.e., what you intend to discover).

Also, given the above, once you receive this information will you withdraw your motions so I don't have to file mine before I leave for vacation this weekend? (The City Solicitor for the City of Dover received your motions and is apoplectic, putting me in a very difficult position).

Thanks,

Dan

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9/3/2008

Griffith, Daniel A.

From: Griffith, Daniel A.
Sent: Wednesday, June 25, 2008 10:13 AM
To: 'BLemon@cblh.com'; 'Scott Swenson'
Subject: FW:
Attachments: 20080625095749_20080625_094951.PDF

Attached are the Use of Force policies and procedures.

From: Chestang, Rosemary [mailto:rchestang@wtplaw.com]
Sent: Wednesday, June 25, 2008 9:50 AM
To: Griffith, Daniel A.
Subject:

9/3/2008

Griffith, Daniel A.

From: Griffith, Daniel A.
Sent: Wednesday, June 25, 2008 10:13 AM
To: 'BLemon@cblh.com'; 'Scott Swenson'
Subject: FW:
Attachments: 20080625095848_20080625_095003.PDF

Attached are the canine policies and procedures.

From: Chestang, Rosemary [mailto:rchestang@wtplaw.com]
Sent: Wednesday, June 25, 2008 9:50 AM
To: Griffith, Daniel A.
Subject:

Griffith, Daniel A.

From: Griffith, Daniel A.
Sent: Wednesday, June 25, 2008 10:14 AM
To: 'BLemon@cblh.com'; 'Scott Swenson'
Subject: FW:
Attachments: 20080625095915_20080625_095035.PDF

Attached is the IA file re: the property damage to Hopkins' vehicle.

From: Chestang, Rosemary [mailto:rchestang@wtplaw.com]
Sent: Wednesday, June 25, 2008 9:51 AM
To: Griffith, Daniel A.
Subject: